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*Attorney for Plaintiff and all others similarly situated*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

SHAHROOZ RAHIMIAN, individually  
and on behalf of all others similarly  
situated,

*Plaintiff,*

v.

RACHEL ADRIANO, and JUAN  
MARTINEZ, INC.,

*Defendants.*

Case No. 2:20-cv-02189-GMN-VCF

**STIPULATION FOR EXTENSION  
OF TIME TO SUBMIT JOINT  
DISCOVERY PLAN AND  
SCHEDULING ORDER**

**(First Request)**

Plaintiff Shahrooz Rahimian and Defendants Rachel Adriano and Juan Martinez, Inc. d/b/a Century 21 Americana hereby stipulate, agree, and move the Court to extend the deadline to file a joint discovery plan and proposed scheduling order for good cause, in support thereof states as follows:

1. On January 25, 2021, Defendant Rachel Adriano answered the complaint, triggering the March 11, 2021 deadline to file a joint discovery plan and proposed scheduling order.

2. On February 2, 2021, Plaintiff's counsel and Defendant Adriano's counsel conducted a preliminary Rule 26 conference.

3. On February 16, 2021, Plaintiff filed an amended complaint adding Defendant

Juan Martinez, Inc. d/b/a Century 21 Americana to this action. Defendant Century 21 Americana's response to the amended complaint is due March 11, 2021.

4. Accordingly, in an effort to include Defendant Century 21 Americana in the Rule 26 meeting and provide the Court (and the parties) with a more fulsome and useful discovery plan reflecting the input of both Defendants in this action, the parties hereby stipulate and agree to a three and a half week extension of time, up to and including April 6, 2021, within which to file a joint discovery plan and proposed scheduling order.

SO STIPULATED.

Respectfully submitted,

Dated: March 11, 2021.

/s/ Avi R. Kaufman

Avi R. Kaufman (Florida Bar no. 84382)

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*Counsel for Plaintiff*

*and all others similarly situated*

KAEMPFER CROWELL

Dated: March 11, 2021.

/s/ Robert McCoy

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

SHAHROOZ RAHIMIAN, individually  
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situated,

*Plaintiff,*

v.

RACHEL ADRIANO, and JUAN  
MARTINEZ, INC.,

*Defendants.*

Case No. 2:20-cv-02189-GMN-VCF

**ORDER GRANTING  
STIPULATION FOR EXTENSION  
OF TIME TO SUBMIT JOINT  
DISCOVERY PLAN AND  
PROPOSED SCHEDULING ORDER**

**(First Request)**

On review and consideration of Plaintiff Shahrooz Rahimian and Defendants Rachel Adriano and Juan Martinez, Inc. d/b/a Century 21 Americana stipulation to extend the deadline to file a joint discovery plan and proposed scheduling order and the record, the Court finds good cause to extend the deadline to submit a joint discovery plan and proposed scheduling order.

In an effort to include Defendant Century 21 Americana in the Rule 26 meeting and provide the Court (and the parties) with a more fulsome and useful discovery plan reflecting the input of both Defendants in this action, the Court GRANTS the parties' stipulation and provides a three and a half week extension of time, up to and including April 6, 2021, within which to file a joint discovery plan and proposed scheduling order.

IT IS SO ORDERED:

  
\_\_\_\_\_  
Honorable Cam Ferencbach  
UNITED STATES MAGISTRATE JUDGE

DATED: 3-18-2021  
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